

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR DRAFT NO. V-06-018

DELTA AIR LINES, INC. CINCINNATI/NORTHERN KENTUCKY INTERNATIONAL AIRPORT

OPERATIONS

HEBRON, KY.

MAY 3, 2006

Ron Schneider, Reviewer

SOURCE I.D. #: 21-015-00062

SOURCE AI #: 171

ACTIVITY #: APE20040001

**SOURCE DESCRIPTION:**

Delta Air Lines, Inc. (Delta) is a major passenger airline that operates its second largest U.S. hub at the Cincinnati/Northern Kentucky International Airport in Hebron, Kentucky. Emission sources include a 10.461 mmBtu/hr natural gas fired boiler, a 1MW emergency generator, a 25,000 gallon underground gasoline storage tank, and miscellaneous use of chemicals throughout the facility including touch up painting of vehicles in a paint booth. Insignificant and trivial activities include several smaller boilers, space heaters and emergency generators; several storage tanks, including those used for storage of deicing fluid and jet fuel; and small scale abrasive blasting, welding and parts cleaning operations.

**COMMENTS:**

The only control employed for any of the emission points is a particulate filter in the paint spray booth, which is part of Emission Point 01 (MS01), Miscellaneous Chemical Usage. Particulate emissions are insignificant, however, as the only spray gun employed is manually loaded and has a capacity of only one quart. Maximum use of paint is estimated at two gallons per day.

The natural gas fired boiler is subject to 401 KAR 59:015, New indirect heat exchangers, and 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (incorporated by reference in 401 KAR 60:005, Section 3(e)). The gasoline storage tank is subject to 401 KAR 59:175, New Service Stations, and 401 KAR 59:050, New Storage Vessels for Petroleum Liquids. To avoid the applicability of 401 KAR 59:174, Stage II controls at gasoline dispensing facilities, record keeping is required to demonstrate an average monthly throughput of gasoline of no more than 25,000 gallons per month.

There is no specific regulation applicable to the emergency generator. 401 KAR 63:020, Potentially hazardous matter or toxic substances, and 401 KAR 59:010, New process operations, apply to the miscellaneous chemical usage, including the paint booth. Particulate emissions from the paint booth are expected to be minimal. Source-wide limits of 45 tons per year for Volatile Organic Compounds (VOC), 11.25 tons per year of combined Hazardous Air Pollutants (HAP), and four (4) tons per year of any individual HAP have been set. ComAir, which is under common ownership also operates at the Cincinnati/Northern Kentucky International Airport, and similar limits will be placed on the ComAir conditional major permit to ensure Delta's overall status as a conditional major source.

AP-42 factors were used to estimate emissions from the boilers and generators, TANKS 4.0 for the gasoline tank. Volatile emissions for the miscellaneous chemical usage is assumed to be 100% of the chemical used, minus any measurable liquid waste stream collected for disposal.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.